

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION**

THE STATE OF NORTH DAKOTA, *et al.*,

Plaintiffs,

v.

THE UNITED STATES DEPARTMENT OF  
INTERIOR, *et al.*,

Defendants.

No. 1:24-cv-66-DMT-CRH

**DEFENDANTS' RENEWED MOTION  
TO TRANSFER**

**DEFENDANTS' RENEWED MOTION TO TRANSFER THIS CASE TO THE UNITED  
STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING**

Defendants—the United States Department of the Interior, Deb Haaland, in her official capacity as the Secretary of the Interior, the Bureau of Land Management (“BLM”), Tracy Stone-Manning in her official capacity as Director of BLM, and Sonya Germann, in her official capacity as Director of BLM Montana/Dakotas—move to transfer this case to the United States District Court for the District of Wyoming. Plaintiffs’ action seeks to build upon that court’s decision in *Wyoming v. U.S. Department of Interior*, 493 F.Supp.3d 1046 (D. Wyo. 2020). That case involved all the parties to this case, many of the same operative facts, and a regulation which Plaintiffs allege is similar the regulation challenged by this action. Transfer is therefore warranted under 28 U.S.C. § 1404(a).

Defendants previously filed a Motion to Transfer on May 9, 2024. Dkt. 5. Plaintiffs then filed an Amended Complaint on May 10, 2024. Dkt. 7. This motion is nearly identical to the first motion, which can be denied as moot, except that the Renewed Motion cites to the Amended Complaint and reflects the entrance of the State of Utah to the case.

Pursuant to D.N.D. Civ. L.R. 7.1(B), a Memorandum in Support will follow this Motion.

Respectfully submitted this 14th day of May, 2024.

TODD KIM  
Assistant Attorney General  
Environment & Natural Resources Division  
United States Department of Justice

/s/ Erik Van de Stouwe

*Counsel for Defendants*